

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :
: Plaintiff, :
v. : : Criminal Action No. 08-26-GMS
MICHELLE LYNCH, :
: Defendant. :
:

MOTION FOR CONTINUANCE OF SENTENCING

Defendant, Michele Lynch, by and through his undersigned counsel, Keir Bradford, hereby moves the Court for an Order continuing the sentencing hearing in this case.

In support of the motion, the defense submits as follows:

1. Ms. Lynch is currently scheduled for sentencing on June 5, 2008 at 4:15p.m.
2. Defense counsel has arranged for Dr. Catherine Barber, Ph. D. to conduct a forensic evaluation of Ms. Lynch on May 15, 2008.
3. Additionally, United States Probation Officer, Jean Lubinski, has modified Ms. Lynch's pre-trial conditions to include mental health counseling, with Dr. Carlena Tucker-Okine Ph D. Ms. Lynch is due to begin counseling sessions with Dr. Tucker-Okine soon after the evaluation.

4. Defense counsel respectfully requests that Ms. Lynch's sentencing be continued for an additional thirty (30) days to allow Dr. Barber time to submit a report, also to allow Ms. Lynch an opportunity to address any treatment issues, which may be helpful for sentencing.

5. Assistant United States Attorney, David L. Hall, the attorney handling this case for the government, has no objection to the defense's continuance request.

WHEREFORE, the defendant respectfully requests that the Court continue the sentencing hearing in this matter to anytime after July 5, 2008.

Respectfully Submitted,

/s/
Keir Bradford Esquire
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Attorney for Defendant Keir Bradford

DATED: May 5, 2008

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UNITED STATES OF AMERICA, :
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ORDER

In response to Ms. Lynch's Motion for Continuance of Sentencing, this Court HEREBY ORDERS on this _____ day of _____, 2008, that Defendant's sentencing hearing be re-scheduled for the _____ day of _____, 2008 at _____ a.m./p.m.

The Honorable Gregory M. Sleet
Chief Judge, United States District Court